## UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF OHIO EASTERN DIVISION

| MRI SOFTWARE, LLC,  | ) Case No. 1:12-cv-01082-CAB  |
|---------------------|-------------------------------|
| Plaintiff,          | )  Judge Christopher A. Boyko |
| v.                  | )                             |
| LYNX SYSTEMS, INC., | )                             |
| Defendant.          | )                             |

## JOINT MOTION TO EXTEND CASE DEADLINES

Plaintiff MRI Software, LLC ("MRI") and Defendant, Lynx Systems, Inc. ("Lynx") hereby jointly move to extend the deadlines set forth in the Court's September 19, 2012 Order stating, *inter alia*, as follows:

Non-expert Discovery due by 1/15/2013. Expert reports due by 3/1/2013 and 4/15/2013. Expert Discovery due by 6/1/2013. Dispositive Motions due by 7/15/2013.

Over the past several months, the parties negotiated and agreed upon a Stipulated Injunction Order, which was entered by the Court on November 9, 2012 and which resolved MRI's Motion for Preliminary Injunction. During this time, Lynx has been engaged in the analysis of insurance coverage and damages issues, which has prevented Lynx from responding to MRI's settlement demand. By next week, Lynx expects to make a new offer of settlement and to supplement its responses to discovery requests served by MRI in June and August.

To allow the parties to further explore the possibility of settlement and complete discovery in the case, the parties respectfully request a four-month extension of the deadlines set forth in the Court's September 19, 2012 Order. Specifically, the parties request that the Court set the following deadlines:

- Non-expert Discovery due by 5/15/2013.
- Expert reports due by 7/1/2013 and 8/15/2013.
- Expert Discovery due by 10/1/2013.
- Dispositive Motions due by 11/15/2013.

This Motion is not meant for purposes of delay, but to allow the parties to complete their negotiations and discovery.

Respectfully submitted,

DATED: December 14, 2012

Signature /s/ Georgia E. Yanchar Signature /s/ John T. McLandrich with email permission John T. McLandrich (0021494) Daniel McMullen (0034380) Georgia Yanchar (0071458) MAZANEC, RASKIN & RYDER CO., LPA CALFEE, HALTER & GRISWOLD, LLP 100 Franklin's Row The Calfee Building 34305 Solon Road 1405 East Sixth Street Cleveland, OH 44139 Cleveland, OH 44114-1607 Telephone: (440) 248-7906 Facsimile: (440) 248-8861 Telephone: (216) 622-8200 Facsimile: (216) 241-0816 jmclandrich@mrrlaw.com dmcmullen@calfee.com gyanchar@calfee.com Counsel for MRI Software, LLC Counsel for Lynx Systems, Inc. Dated: December 14, 2012 Dated: December 14, 2012